

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROBERT A. WILLIAMS,

Plaintiff,

v.

**LG CHEM, LTD. and LG CHEM
AMERICA, INC.,**

Defendants.

Case No. 4:21-CV-966-SRC

**SUPPLEMENTAL DECLARATION OF HWI JAE LEE
IN SUPPORT OF DEFENDANT LG CHEM, LTD.'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Hwi Jae Lee, hereby declare and state as follows:

1. I am over the age of eighteen (18) years old and am competent to testify to the matters contained in this Declaration.
2. This Supplemental Declaration is submitted in further support of Defendant LG Chem, Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction, and I have been authorized by LG Chem, Ltd. ("LG Chem") to execute this Declaration for this purpose.
3. I have personal knowledge of the facts described in this Declaration. If called upon as a witness, I could and would testify competently under oath as to all such facts based upon my personal knowledge and my review of applicable business records.
4. I am currently employed at LG Energy Solution, Ltd. ("LGES"), an entity formed on December 1, 2020, in a spin-off of LG Chem's battery division. LGES is a subsidiary of LG Chem and became a publicly traded company on January 27, 2022.
5. My current title is Specialist, and my area of responsibility includes sales of battery packs and small application battery cells, including 18650 cylindrical lithium ion battery cells. I

was formerly employed by LG Chem from 2015 through November 30, 2020. While at LG Chem, my most recent title was Sales Professional, and my responsibility included sales of 18650 lithium ion battery cells since approximately 2015.

6. As a result of the spin-off, LGES is now in possession of business records related to the business of LG Chem's former battery division, including all business records related to the design, manufacture, distribution, and sale of 18650 lithium ion battery cells.

7. I have reviewed Plaintiff's Complaint and Plaintiff's Opposition to Defendant LG Chem, Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction ("Opposition Brief").

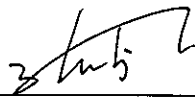
8. In his Complaint, Plaintiff alleges that he was injured when a battery he describes as "a 18650 lithium-ion battery manufactured by LG" exploded in his pocket. (Compl. ¶ 1.) Plaintiff also alleges that LG Chem "purposefully flooded the U.S. market (and the market in the State of Missouri in particular) with lithium-ion batteries, including cylindrical 18650 lithium-ion batteries." (Compl. ¶ 3.)

9. In his Opposition Brief, Plaintiff states that he alleged in his complaint that LG Chem "designed, manufactured, sold and shipped tens of thousands of the same product [a cylindrical 18650 lithium-ion battery] to buyers in Missouri." (Plf. Opp'n Br., at 1.) I am not aware of any basis for the assertion that LG Chem sold or shipped tens of thousands of 18650 lithium ion cells to buyers in Missouri.

10. I have reviewed LG Chem's sales records, and based on that review, confirmed that LG Chem did not sell or ship any 18650 lithium ion cells to anyone located in Missouri in the three years preceding the date of Plaintiff's alleged incident (August 7, 2018).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 22nd, 2022 at Seoul, South Korea

A handwritten signature in black ink, appearing to read 'Hwi Jae Lee', written over a horizontal line.

Hwi Jae Lee